



May 1, 2025

VIA ECF

Hon. John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Joseph Srour v. City of New York, et al.*
22 Civ. 0003 (JPC)

Your Honor,

I represent the plaintiff, Joseph Srour, in the above-referenced matter. I write with the consent of defendants' counsel Aimee Lulich, to request a brief one-week extension of time in which to submit the parties' pre-trial submissions for the non-jury trial scheduled for May 29, 2025. Notably, the parties will not be filing motions *in limine*.

No prior request for this relief has been made.

The parties are seeking a one-week enlargement of time in which to submit the Joint Pre-Trial Order and Proposed Joint Stipulation of Facts and Conclusions of Law, which are currently scheduled to be filed on May 2, 2025. If this request is granted, the parties' submissions would be filed on Friday, May 9, 2025.

The reason for this request is that, since the scheduling of such deadlines on April 2, 2025 I have been preparing for and engaged in several depositions, including expert depositions in a multi-party civil rights action [*Mintz v. James*, 1:23-cv-00795-MAD-CFH (N.D.N.Y.)], an Article 78 proceeding [*Asprea v. McGinty*, CV250632 (3d Dept.)]; summary judgment motions and intervenor cross-motion in *McGregor v. Suffolk County*, 23 Civ. 1130 (GRB)(ARL) (E.D.N.Y.), an appeal in *Hoyt v. Figueroa*, CV-24-1714 (3d Dept.), motion to dismiss in *Klare v. McElduff*, 7:24-cv-08565-CS (S.D.N.Y.), a party deposition in *Cohen v. New York City*, 1:24-cv-02594LJL (S.D.N.Y.), and joint stipulations of fact for a preliminary injunction motion in *Susman v. Sullivan*, 1:24-cv-01281-LJV (W.D.N.Y.), in addition to deadlines in administrative proceedings, and practice-related responsibilities. As the Court may know, I am a solo practitioner with no staff and no 'Of Counsel' attorneys.

I was able to provide Ms. Lulich with a draft of the parties Joint Proposed Pre-Trial Order (JPTO) earlier this morning, but was advised that, understandably, she would be unable to review the

The request is granted. The parties' deadline to submit the required pretrial filings set forth in the Court's April 3, 2025 Order, Dkt. 63, is extended to May 9, 2025, with any responsive pretrial memoranda of law due by May 16, 2025. This extension does not apply to the deadline for any motions *in limine*, and any motions *in limine* filed after the present May 2, 2025 deadline will not be considered. The other deadlines set forth in the Court's April 3 Order remain unchanged. The Clerk of Court is respectfully directed to close Docket Number 65.

SO ORDERED.
Date: May 2, 2025


JOHN P. CRONAN
New York, New York

United States District Judge

document and make changes by tomorrow's submission deadline.

Because the parties are not filing any motions *in limine*, the one-week extension of time should not affect the non-jury trial date of May 29, 2025. Thank you for the Court's consideration.

Very truly yours,

Amy Bellantoni
Amy L. Bellantoni

cc: Aimee Lulich, Esq.
(via ECF)